



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

October 24, 2018

ALEXANDRA ROJAS, TREASURER
JUSTICE DEMOCRATS
P.O. BOX 910
KNOXVILLE, TN 37902

Response Due Date
11/28/2018

IDENTIFICATION NUMBER: C00630665

REFERENCE: AMENDED JULY QUARTERLY REPORT (04/01/2018 - 06/30/2018),
RECEIVED 09/28/2018

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in enforcement action.** Additional information is needed for the following 7 item(s):

1. Schedule A (see attached) discloses contributions from an individuals who have a mailing address outside of the United States of America. Please be advised that 52 U.S.C. §30121(a) (formerly 2 U.S.C. §441e(a)) and 11 CFR §110.20 prohibit foreign nationals from making contributions in connection with any election for political office or in connection with any primary election, convention, or caucus held to select candidates for any political office.

If the apparently prohibited contributions in question were incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If your committee follows the safe harbor guidelines outlined under 11 CFR §110.20(a)(7) for all contributions received from a foreign address to ensure that the sources of these contributions are not foreign nationals, please provide a detailed description of your procedures. These procedures must be used in all cases where a contributor or donor uses a foreign passport or passport number for identification purposes, provides a foreign address, makes a contribution or donation by means of a check or other written instrument drawn on a foreign bank or by wire transfer from a foreign bank, or resides abroad. A committee is deemed to have conducted a reasonable inquiry into the contributor or donor's nationality if you seek and obtain copies of current and valid U.S. passport papers for U.S. citizens. No person may rely on this safe harbor if he or she has actual

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knowledge that the source of the funds solicited, accepted, or received is a foreign national.

If you have received a contribution from a foreign national, you must refund the impermissible contribution to the donor in accordance with 11 CFR §103.3(b). Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the refund. In addition, any refunds should be disclosed on Schedule B supporting Line 28 (a) of the report during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action on your part to refund or provide clarifying information concerning these contributions will be taken into consideration.

2. Schedule A supporting Line 17 of your report discloses apparent offsets to operating expenditures (see attached); however, your report(s) does not appear to disclose disbursements to these entities. Please provide clarifying information regarding this activity and amend your report(s) if necessary. (11 CFR § 104.3(a) & (b))

3. Your report discloses a payment on Schedule A from "Bernal Alto LLC" that has not been recorded on Schedule D. Debt payments must also be reflected on Schedule D. Please amend your report to clarify this discrepancy. (52 U.S.C. §30104(b)(4) (formerly 2 U.S.C. §434(b)(4)))

4. Your report discloses a negative entry on Line 21(b) with a purpose "Operating Costs moved to Line 23 as in-kind contributions" and corresponding positive disbursements for "In-kind of Operating Costs paid on behalf of Committee," "In-kind of Phone Bank," "Inkind of Operating Costs paid on behalf of Committee Inkind of phone bank," "Inkind of Relay Text Messaging," and "kind of Operating Costs paid on behalf of Committee" disclosed on Line 23. Please be advised that offsetting negative entries on Line 21(b) should only be disclosed when reporting in-kind contributions of committee-owned assets (see attached for further guidance on reporting in-kind contributions to federal candidates). Please provide further clarifying information or amend your report to properly disclose the in-kind activity.

5. Schedule B supporting Line 23 discloses one or more contributions to candidates for the 2018 Primary election; however, the funds were disbursed after the election dates (see attached). Please note that contributions may not be designated for an election which has already occurred unless the funds are to be

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used to reduce a candidate committee's debts incurred during that election campaign. (11 CFR §§110.1(b)(3) and 110.2(b)(3))

If any apparently impermissible contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If the contributions in question should have been designated for debt retirement, you should amend your report to indicate "debt retirement," along with the year of election.

If you have made an impermissible contribution, you must request a refund or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund. (11 CFR §103.3(b)(1) and (3))

Please inform the Commission of your corrective action promptly in writing and provide a photocopy of the refund or redesignation request sent to the recipient committees. In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. (11 CFR §110.1(b))

Although the Commission may take further legal action regarding this impermissible activity, your prompt action in obtaining a refund and/or redesignating the contributions will be taken into consideration.

6. Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. Please be advised that 52 U.S.C. §30116(a) (formerly 2 U.S.C. §441a(a)) prohibits a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's

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receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

Please inform the Commission of your corrective action promptly in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee. In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. (11 CFR §110.1(b))

Although the Commission may take further legal action regarding the excessive contributions, your prompt action in obtaining a refund and/or redesignating the contributions will be taken into consideration. (11 CFR §103.3(b)(1) and (3))

7. On Schedule B supporting Line 23 of the Detailed Summary Page, your committee discloses disbursements for "Inkind of Operating Costs paid on behalf of Committee," "Inkind of phone bank," and "kind of Operating Costs paid on behalf of Committee" and lists itself ("JUSTICE DEMOCRATS") as the payee. Please clarify the nature of these transactions or amend Schedule B by providing the correct names and mailing addresses of the payees.

- Your report discloses certain categories of financial activity that have been reflected on the wrong lines of the Detailed Summary Page. For your information and consideration when preparing future filings, offsets to operating expenditures should be properly disclosed on a separate Schedule A, supporting Line 15 of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing. (52 U.S.C. §30104(b) (formerly 2 U.S.C §434(b)) and FORM 3X Instructions)

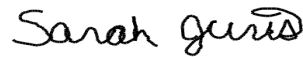
Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

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Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. For additional information about the report review process or specific filing information for your committee type, please visit the Reports Analysis Division's Frequently Asked Questions on the FEC website. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1175.

Sincerely,

A handwritten signature in black ink that reads "Sarah Juris". The signature is written in a cursive, flowing style.

Sarah Juris
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

Impermissible, Excessive, and Prohibited Contributions
JUSTICE DEMOCRATS (C00630665)

Contributions from Possible Foreign Nationals

Contributor Name	Date	Amount	Report
Marchant, Anna	4/26/18	\$27.00	2018 July Quarterly
Marchant, Anna	4/28/18	\$13.50	2018 July Quarterly
Marchant, Anna	5/26/18	\$27.00	2018 July Quarterly
Marchant, Anna	5/28/18	\$13.50	2018 July Quarterly
Marchant, Anna	6/26/18	\$27.00	2018 July Quarterly
Marchant, Anna	6/28/18	\$13.50	2018 July Quarterly
Polaco, Jose	4/30/18	\$50.00	2018 July Quarterly
Polaco, Jose	5/31/18	\$50.00	2018 July Quarterly
Polaco, Jose	6/30/18	\$50.00	2018 July Quarterly
Salomon, George	5/12/18	\$10.00	2018 July Quarterly
Salomon, George	5/15/18	\$27.00	2018 July Quarterly
Salomon, George	5/16/18	\$13.50	2018 July Quarterly
Salomon, George	5/29/18	\$27.00	2018 July Quarterly
Salomon, George	6/4/18	\$27.00	2018 July Quarterly
Salomon, George	6/14/18	\$27.00	2018 July Quarterly
Salomon, George	6/21/18	\$5.00	2018 July Quarterly
Salomon, George	6/28/18	\$27.00	2018 July Quarterly

Contributions Made After Election Date

Recipient Name	Date	Amount	Election	Election (State-Date)
CLARK, ANTHONY	5/31/18	\$1,210.84	P2018	IL - 3/20/18
GILL, DAVID MICHAEL DR. Michael	5/31/18	\$21.76	P2018	IL - 3/20/18
MUSTAFA, SAMEENA	6/30/18	\$733.50	P2018	IL - 3/20/18
CANON, DANIEL J J	5/31/18	\$135.67	P2018	IN - 5/8/18
MARSHALL, JENNIFER	5/31/18	\$384.38	P2018	NC - 5/8/18
VILELA, AMY	6/30/18	\$426.11	P2018	NV - 6/12/18
VILELA, AMY	6/30/18	\$44.91	P2018	NV - 6/12/18
VILELA, AMY	6/30/18	\$47.26	P2018	NV - 6/12/18
DEVITO, MICHAEL JR	6/30/18	\$17.35	P2018	NY - 6/26/18
DEVITO, MICHAEL JR	6/30/18	\$3.02	P2018	NY - 6/26/18
GOLDEN, IAN	6/30/18	\$75.22	P2018	NY - 6/26/18
GOLDEN, IAN	6/30/18	\$39.82	P2018	NY - 6/26/18

Impermissible, Excessive, and Prohibited Contributions
JUSTICE DEMOCRATS (C00630665)

Contributions Made After Election Date (cont'd)

Recipient Name	Date	Amount	Election	Election (State-Date)
NELSON, PATRICK F F	6/30/18	\$46.57	P2018	NY - 6/26/18
RUSSELL, JOHN	5/31/18	\$116.18	P2018	OH - 5/8/18
EDWARDS, GREG	6/30/18	\$383.65	P2018	PA - 5/15/18
JONES, JIMMY DARNELL	5/31/18	\$215.83	P2018	TX - 3/6/18
MOSER, LAURA	4/30/18	\$81.00	P2018	TX - 3/6/18
TREVINO, RICARDO JOSE JR Jose Jr	4/30/18	\$1.30	P2018	TX - 3/6/18
TREVINO, RICARDO JOSE JR Jose Jr	5/31/18	\$271.78	P2018	TX - 3/6/18
TREVINO, RICARDO JOSE JR Jose Jr	5/31/18	\$7.90	P2018	TX - 3/6/18
WILSON, MARY E	4/30/18	\$158.08	P2018	TX - 3/6/18
WILSON, MARY E	5/31/18	\$35.27	P2018	TX - 3/6/18
WILSON, MARY E	5/31/18	\$64.56	P2018	TX - 3/6/18
WILSON, MARY E	4/30/18	\$12.42	P2018	TX - 3/6/18
WILSON, MARY E	5/31/18	\$58.72	P2018	TX - 3/6/18

Excessive Contributions to a Candidate/Committee with an Affiliated Committee

Recipient Name	Date	Amount	Election	Report	Contributing Affiliate
ANTHONY CLARK 2018	11/3/17	\$2,700.00	P2018	2017 Year-End	C00630665
CLARK, ANTHONY	2/22/18	1/25/00	P2018	2018 April Quarterly	C00613810
CLARK, ANTHONY	2/28/18	\$25.42	P2018	2018 April Quarterly	C00630665
CLARK, ANTHONY	3/1/18	\$188.63	P2018	2018 April Quarterly	C00630665
CLARK, ANTHONY	3/15/18	\$45.58	P2018	2018 April Quarterly	C00613810
CLARK, ANTHONY	3/15/18	\$47.50	P2018	2018 April Quarterly	C00613810
CLARK, ANTHONY	3/19/18	\$58.00	P2018	2018 April Quarterly	C00613810
CLARK, ANTHONY	3/19/18	\$192.00	P2018	2018 April Quarterly	C00613810
CLARK, ANTHONY	3/19/18	\$10.87	P2018	2018 April Quarterly	C00613810
CLARK, ANTHONY	3/19/18	\$39.13	P2018	2018 April Quarterly	C00613810
CLARK, ANTHONY	3/20/18	\$143.66	P2018	2018 April Quarterly	C00613810
CLARK, ANTHONY	3/20/18	\$337.75	P2018	2018 April Quarterly	C00613810
CLARK, ANTHONY	3/31/18	\$149.30	P2018	2018 April Quarterly	C00613810
CLARK, ANTHONY	5/31/18	\$1,210.84	P2018	2018 July Quarterly	C00630665

Apparent Offsets to Operating Expenditures with No Previous Disbursements
JUSTICE DEMOCRATS (C00630665)

Apparent Offsets to Operating Expenditures

Name	Date	Amount
Abdul El-Sayed for Michigan	5/1/18	\$385.22
Abdul El-Sayed for Michigan	5/30/18	\$958.22
ALEXANDRIA OCASIO-CORTEZ 2018	5/1/18	\$796.03
ALISON HARTSON 2018	4/12/18	\$737.64
ALISON HARTSON 2018	5/21/18	\$332.49
ALISON HARTSON 2018	6/15/18	\$1,952.56
ANTOINETTE SEDILLO LOPEZ FOR CONGRESS	6/5/18	\$412.50
Bernal Alto LLC	4/23/18	\$1,489.06
Bernal Alto LLC	4/23/18	\$4,680.00
Bernal Alto LLC	5/7/18	\$9,064.82
Bernal Alto LLC	5/22/18	\$4,370.36
Bernal Alto LLC	6/27/18	\$5,870.50
CAMPA-NAJJAR FOR CONGRESS	4/18/18	\$358.08
DOROTHY GASQUE FOR CONGRESS	4/23/18	\$377.60
FRIENDS OF JESS KING	4/23/18	\$292.13
FRIENDS OF JESS KING	5/11/18	\$4.21
JACOB 2018	4/18/18	\$333.08
LORIE BURCH FOR CONGRESS	5/30/18	\$240.63
PAULA SWEARENGIN 2018	4/18/18	\$1,000.00
PAULA SWEARENGIN 2018	5/8/18	\$1,950.63
SAAD FOR CONGRESS	5/8/18	\$532.54

Campaign Guide for Nonconnected Committees

IN-KIND CONTRIBUTIONS TO CANDIDATES

SCHEDULE B (FEC Form 3X) ITEMIZED DISBURSEMENTS		FOR LINE NUMBER: (check only one)		PAGE 1 OF 1	
Use separate schedule(s) for each category of the Detailed Summary Page		<input checked="" type="checkbox"/> 21b <input type="checkbox"/> 27		<input type="checkbox"/> 22 <input type="checkbox"/> 23 <input type="checkbox"/> 24 <input type="checkbox"/> 25 <input type="checkbox"/> 26 <input type="checkbox"/> 28a <input type="checkbox"/> 28b <input type="checkbox"/> 28c <input type="checkbox"/> 29 <input type="checkbox"/> 30b	
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.					
NAME OF COMMITTEE (In Full) Civil Republic PAC					
Full Name (Last, First, Middle Initial)					
A. Westroads Liquor			Date of Disbursement MM / DD / YYYY 08 / 26 / 2008		
Mailing Address 19 Main Street					
City City			State ST		
Zip Code 00000					
Purpose of Disbursement Reception			Category/ Type 011		
Candidate Name Stephen Bagwell			Amount of Each Disbursement this Period 972.40		
Office Sought: <input type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President			Disbursement For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
State: ST			District: 08		
MEMO: In-kind: See Schedule B, Line 23					

SCHEDULE B (FEC Form 3X) ITEMIZED DISBURSEMENTS		FOR LINE NUMBER: (check only one)		PAGE 1 OF 1	
Use separate schedule(s) for each category of the Detailed Summary Page		<input type="checkbox"/> 21b <input type="checkbox"/> 27		<input checked="" type="checkbox"/> 23 <input type="checkbox"/> 28a <input type="checkbox"/> 28b <input type="checkbox"/> 28c <input type="checkbox"/> 29 <input type="checkbox"/> 30b	
Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.					
NAME OF COMMITTEE (In Full) Civil Republic PAC					
Full Name (Last, First, Middle Initial)					
A. Westroads Liquor			Date of Disbursement MM / DD / YYYY 08 / 24 / 2008		
Mailing Address 19 Main Street					
City City			State ST		
Zip Code 00000					
Purpose of Disbursement Reception			Category/ Type 011		
Candidate Name Stephen Bagwell			Amount of Each Disbursement this Period 972.40		
Office Sought: <input checked="" type="checkbox"/> House <input type="checkbox"/> Senate <input type="checkbox"/> President			Disbursement For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)		
State: ST			District: 08		
In-kind					

and indicate the report on which the original contribution was itemized.

In the illustration on the next page, a nonconnected committee originally made a \$10,000 contribution to a candidate's campaign, intending half of it to count toward the general election. The nonconnected committee itemized the contribution in its April quarterly report. The following month, the campaign requested that the committee redesignate the excessive \$5,000 for the general election campaign. The nonconnected committee then itemized the redesignation in its July quarterly report.

Memo Entry

Use a memo entry on a schedule to provide information that is not included in the schedule's total dollar figure. Memo entries are used, for example, to disclose the redesignation of a contribution.

Filers should exercise caution not to confuse "memo entries" with the "memo text" function used to supply additional information when filing electronically using FECFile.

Additional Information on Candidates

Further information is required when itemizing a contribution to a candidate committee on Schedule B. List the candidate's name and the office sought (including the state and, if applicable, Congressional district). When itemizing a contribution or loan to a candidate committee, specify the election for which the payment was made by checking the appropriate category in the election designation box. 104.3(b)(3)(v). See illustrations above.

Redesignations of Contributions

Use memo entries to show any redesignations of contributions.

If a contribution to a candidate is redesignated for a different election after the close of books for the reporting period during which the contribution was made, show the redesignation on the next report